

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GULAN LIAO,)
Plaintiff,) Civil Action No. 23-cv-15435
v.)
THE INDIVIDUALS,)
CORPORATIONS, LIMITED) JURY TRIAL DEMANDED
LIABILITY COMPANIES,)
PARTNERSHIPS, AND)
UNINCORPORATED ASSOCIATIONS)
IDENTIFIED ON SCHEDULE A TO)
THE COMPLAINT,)
Defendants.)

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff files this Motion requesting leave to file the following documents under seal: (1) Exhibits 1 and 2 to Plaintiff's Complaint, which constitute Plaintiff's patent and copyright asserted in this action; (2) Plaintiff's Exhibit 3 to the Complaint, which includes additional allegations reflecting the Parties' identities, the disclosure of which would compromise the confidentiality of Plaintiff's *Ex Parte* Motion for Entry of Temporary Restraining Order ("Plaintiff's TRO Motion"); (3) Schedule A attached to the Complaint, which includes a list of the Defendant Online Marketplace Accounts; and (4) Plaintiff's TRO Motion, and accompanying supporting memorandum, declaration, and exhibits, which include screenshot printouts showing the infringing products as well as information regarding Plaintiff and Plaintiff's pertinent product.

In this action, Plaintiff is requesting temporary *ex parte* relief based on an action asserting patent infringement. Sealing of the files is necessary to prevent Defendants from learning of these proceedings prior to execution of the temporary restraining order. If Defendants were to learn of

these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence, the hiding of assets and/or transferring of assets to foreign jurisdictions, and the refusal of Defendants to participate in the case. Such maneuvering would frustrate the purpose of the underlying law and would interfere with, and likely entirely undermine, Plaintiff's ability to secure relief.

Date: October 30, 2023

Respectfully submitted,

By: /s/ Shengmao Mu
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